

In The United States District Court Of  
The Middle District of Alabama  
Eastern Division

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FOR P. HACKETT  
U.S. DISTRICT COURT  
MIDDLE DISTRICT ALA.

Plaintiff,

William Lanier Ellis Sr.

Defendant,

Tina Riley, Dr. Spud Warr

Case # 3:07-CV-920-MHT

Motion to Amend Complaint

Comes now the plaintiff on this 21<sup>ST</sup> day  
of November, 2007. Seeks to Amend the original Complaint.

Grounds,

(a) That relief will not be granted to plaintiff  
with out this Honorable Courts full intervention.

(B) Defendants have Shown their lack of respect  
to these proceedings, Furthermore holds Contempt for the  
authority of this Court.

(C) The Plaintiff is entitled to monetary Damages  
and relief for his pain and suffering.

(D) In light of this Courts authority to intervene when serious bodily injury is at risk. The plaintiff has been further injured. On 11-20-07 Due to Carelessness of staff.

(E) These injuries further inhibit the plaintiff's already depleted activity.

## Discussion

The plaintiff Comes in good Cause for relief. In light of the numerous visits to the Defendants for relief. The plaintiff has Shamlessly asked and even begged for relief of his suffering. Although trivial efforts by the Defendants have been made it is undoubtedly Clear No relief that is reasonable between the two parties Can be reached.

As in accordance with this Courts order the plaintiff has, so been advised to resolve my issue with this Court by the Administrator of this facility. The Grievance was filed 10/23 and Returned on 10/27 advising the plaintiff to detour from harassing medical staff. Every Complaint has been submitted to the defendants in writing. The procedures are exhausted as ordered by this Court. On 11-20-07 the plaintiff suffered another back injury. Staff intentionally busted a water bag in the middle of the dormitory to punish the whole dorm rather than the individual.

The plaintiff not having knowledge of this until he went to use the phone and slipped and fell in the puddle of water. The plaintiff was taken to a holding cell

Parked in a wheel chair dripping wet in severe pain and told that if the nurse said I could go to the Hospital I would go. Approximately an hour and 45 minutes later I'm pulled out threatened and harassed.

With that said the officer accompanying the plaintiff (officer STHIL) is not happy about this. Now I'm being snatched on and pulled at. I obey the orders given when the restraint belt is put on me it's put on so tight it's buckling my legs. The plaintiff is presented with a choice This way or no way.

These officers have little respect for the very laws they uphold. Arriving at the hospital at 9.05 pm the plaintiff is admitted. Now I'm being interrogated about my Criminal proceedings and my crime. It's a no win situation all I came for was medical treatment.

My Blood pressure was 153/100 and I'm asked if I suffer from high Blood pressure. I answer the nurse and tell her it's been high lately. The following morning Dr. Waver comes in and wants to know what happened by way of the medical officer but no follow up on this incident is done.

The plaintiff has motioned to this Court twice for Counsel and was denied. The plaintiff wants this Honorable Court to make it known for the record he fears for his very life and at some point staff will take out their anger upon him for these proceedings.

Those persons responsible for further injury to the plaintiff. Those persons be held accountable. This was a malicious act and a mocking act of punishment. Furthermore it is unprofessional and Careless.

The plaintiff seeks monetary damages that he is entitled to. Each and every day he has been purposely made to suffer terrible pain to date, some 3 1/2 months. That he be awarded Five Hundred Dollars per day and no less than One Million Five Hundred Thousand dollars for the act of personal injury about his person, namely Further irreparable injury to the plaintiff's back. On 11-20-07

The plaintiff asks that the administration of this facility be amended into the record. Furthermore seeks Counsel, to protect his Constitution al Rights and to ensure his safety to avoid further injury. Those having Custody of him refuse him any provisioned study time in the facility library in fact the plaintiff Cant even get a response on inmate requests for time in the Law Library.

Furthermore true and original documents the plaintiff needs to provide this Honorable Court to Clarify and Appellate these proceedings. Those having Custody of him refuse to furnish any copies of, Medical request, regular request, and Grievance's so this Court May have full Knowledge of this plaintiffs request for relief and monetary damages that the plaintiff is entitled.

### Conclusion

There are a small fraction of wents around and about the plaintiff. You have to Conclude that thier is a real problem. Either with those persons, or administration and guide lines. Certainly every institution has to have guidelines to govern its inmates.

These are the kind of breakdowns in the system

That put people's lives at risk. Furthermore this is a deep rooted problem that will not go away. Moreover the plaintiff would like this conclusion to involve, Case # 74447 from the U.S. Department of Health and Human Services. Received on Oct 25 2007, Returned Oct 30, 2007 upon receipt of my Correspondence (OER) Office for Civil Rights. Currently is investigating this facility, to decide if they have the authority to take action. By way of Roosevelt Freeman, Regional Manager, Also a formal Complaint with the national Epilepsy Foundation 8301 Professional Place, Landover MD 20785.

The Plaintiff has good Cause to have this motion granted By this Honorable Court and with due respect closes this motion.

Respectfully Submitted, this 21<sup>st</sup> day of November.

Signed, William James Ellis Jr.

Certificate of Service, I William James Ellis Jr. have hand delivered a true and exact copy of this document to the Defendants.

William James Ellis Jr.

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